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18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**

20 LD, DB, BW, RH, and CJ on behalf of
themselves and all others similarly situated,

21 Plaintiffs,

22 vs.

23 UNITED BEHAVIORAL HEALTH, INC., a
24 California Corporation,
UNITEDHEALTHCARE INSURANCE
25 COMPANY, a Connecticut Corporation, and
MULTIPLAN, INC., a New York
26 Corporation,

27 Defendants.
28

Case No. 4:20-cv-02254-YGR-JCS

(Hon. Yvonne Gonzalez Rogers)

JOINT STIPULATION AND
[~~PROPOSED~~] ORDER TO EXTEND
DEADLINES RE DKT. 324

Pursuant to Local Rules 6-2 and 7-12, Plaintiffs LD, et al. and Defendants United Behavioral Health, United Healthcare Insurance Company, and MultiPlan, Inc. (collectively, “Defendants” and with Plaintiffs, the “Parties”) stipulate and agree to the extend the briefing schedule for Plaintiffs’ Administrative Motion to File Material Designated as Confidential Under Seal (Dkt. 324) in this case as set forth below, subject to this Court’s approval. The Parties have met and conferred and agreed on the following modifications to the current schedule. For the reasons set out below, the Parties respectfully submit that good cause exists for the following modifications. In further support, the Parties state as follows:

Whereas, on July 16, 2023, Plaintiffs filed an Administrative Motion to File Material Designated as Confidential Under Seal (Dkt. 324) (the “Sealing Motion”);

Whereas, pursuant to Local Rule 79-5, any statement in support of Plaintiffs’ Motion is currently due on July 24, 2023;

Whereas, Defendants have been diligently reviewing and assessing Plaintiffs’ recent filings and anticipate needing additional time to respond to the Sealing Motion;

Whereas, the Parties agree that the Defendants may have an additional 7 days, through and including July 31, 2023, to file any statement in support of Plaintiffs’ Sealing Motion;

Whereas, the Parties further agree that Plaintiffs will have 7 days from July 31, 2023, through and including August 7, 2023, to file any response.

Whereas, this Court has not previously extended Defendants’ deadline to file a statement in support of Plaintiffs’ Sealing Motion, nor considered any request regarding a response from Plaintiffs, though the Court has granted other various extension requests;

Whereas, the extensions requested herein will have no effect on the current schedule for the case;

Whereas, nothing in this Joint Stipulation alters any other rights not addressed herein, and the Parties expressly reserve the right to seek further relief from the Court as necessary.

NOW, THEREFORE, subject to the approval of the Court, and for good cause shown, the Parties hereby stipulate and agree as follows:

Defendants will have until July 31, 2023, to file any statement in support of Plaintiffs’

Administrative Motion to File Material Designated as Confidential Under Seal (Dkt. 324), and
Plaintiffs will have until August 7, 2023, to file any response.

Dated: July 20, 2023

Respectfully submitted,

PHELPS DUNBAR LLP

By: /s/ Craig Caesar
CRAIG L. CAESAR

Attorneys for Defendant MultiPlan, Inc.

GIBSON, DUNN & CRUTCHER LLP

By: /s/Geoffrey Sigler

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Insurance Company and United Behavioral
Health*

ARNALL GOLDEN GREGORY LLP

By: /s/ Aaron Modiano
AARON R. MODIANO

Attorneys for Plaintiffs


~~PROPOSED~~ ORDER

Having considered the Parties' Joint Stipulation and ~~Proposed~~ Order to Extend Deadlines re Dkt. 324, the Court HEREBY ORDERS as follows:

Defendants will have until July 31, 2023, to file any statement in support of Plaintiffs' Administrative Motion to File Material Designated as Confidential Under Seal (Dkt. 324), and Plaintiffs will have until August 7, 2023, to file any response.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 24, 2023


Honorable Yvonne Gonzalez Rogers
United States District Judge